CORRES. CONTROL
INCOMING LTR NO.

0894 RF 93

DUE
DATE

ACTION

DIST.	LTR	ENC
BENEDETTI, R.L.	X	
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
CROUCHER, D.W.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
IDEKER, E.H.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
RILEY, J.H.		
SANDLIN, N.B.		
SATTERWHITE, D.G		
SCHUBERT, A.L.		
SETLOCK, G.H.		
SHEPLER, R.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		
Arndt M	X	X
Smith D	X	X
Nesta S	X	X
Flory D	X	X
Lindburgh K	X	X
Taylor C	X	X

CORRES CONTROL	x	x
TRAFFIC		

Reviewed for Addressee
Corres. Control RFP

2/24/93 Ci
DATE BY

Ref Ltr. #

States Government **Department of Energy**

Memorandum

FEB 24 3 21 PM '93

Rocky Flats Office

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

FEB 24 1993

ERD:BKT:00848

Baseline Risk Assessment Exposure Assessment Modeling

Robert Benedetti, Associate General Manager
Environmental Restoration Management,
EG&G Rocky Flats, Inc.

The RFP IAG requires the preparation of technical memoranda to support the baseline risk assessment portion of the RFI/RI Reports for each of the OU's. One of the technical memoranda is devoted exclusively to exposure assessment modeling and includes a description of the fate and transport models that will be utilized. To date, modeling technical memoranda have been prepared for OUs 1, 2 and 7. Of these, only OU 1 has been submitted to EPA, CDH and the Natural Resource Trustees for review and comment. However, DOE/RFO has reviewed all three documents.

We have three major concerns regarding exposure assessment modeling at the RFP. The first concern relates to the consistency of models used from one OU to the next. We have observed that several of the models proposed for use at OUs 2 and 7 are not consistent with those used and approved at OU 1. Consistency among models used at the individual OUs at the RFP will be an important issue when the comprehensive risk assessment described in paragraph 154 of the IAG is initiated. We believe this to be a question of when rather than a question of if the comprehensive risk assessment is undertaken.

Our direction to EG&G is to look ahead to the program requirements in the not too distant future. Consistency of exposure assessment models at the individual OUs will have a significant impact on the exposure assessment for the comprehensive risk assessment. Thus, we intend to avoid repeating exposure assessment modeling efforts conducted for individual OUs during the comprehensive risk assessment.

We request that EG&G utilize consistent exposure assessment models for individual OU risk assessments in order to prepare for the comprehensive risk assessment. Technically sound justification must be provided to DOE/RFO when models are proposed that are not consistent with those previously used. This direction was provided to your staff at a meeting for OU 2 on November 18, 1992, and for OU 7 in DOE/RFO memorandum ERD:BKT:00493, dated January 12, 1993.

ADMIN RECORD

The second concern relates to the disconnect between exposure assessment modeling for human and ecological receptors. Section VII.D.1, Attachment II of the IAG is very clear that baseline risk assessment technical memoranda are required for human health only. However, Section VIII.C, Attachment II of the IAG states that "DOE shall utilize the Interim Final Risk Assessment Guidance for Superfund - Environmental Evaluation Manual in preparing this plan". Inspection of page 41 of this document makes it very clear that exposure assessment modeling also applies to ecological receptors. Inspection of the October 1992, Draft Phase III RFI/RI Report for OU 1 indicates two major problems: 1) that exposure assessment modeling was not conducted for the environmental evaluation and 2) that exposure assessment modeling conducted for the human health risk assessment was not applied to the environmental evaluation.

We request that EG&G integrate baseline risk assessment exposure assessment modeling for human and ecological receptors in future RFI/RI reports at the RFP. If the modeling technical memorandum cannot be expanded to include ecological receptors, at a minimum, the baseline risk assessment within the RFI/RI reports should contain exposure assessment modeling for both human and ecological receptors that is integrated. Note that the EPA guidance referenced earlier states that complete integration is not always appropriate.

The third concern relates to modeling conducted during the FS/CMS which will impact remedial decisions for the OUs at the RFP. Models utilized during the baseline risk assessment should be applicable to the detailed evaluation of alternative portion of the FS/CMS. To date, this has been stated as an objective in the modeling technical memoranda. The use of consistent models, hopefully, will contribute to consistent remedial decisions across the OUs.

James K. Hartman
Assistant Manager
for Environmental Management

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